

FILED

JASMINE JOHNSON  
2801 Main St 448  
IRVINE , CA 92614

2024 SEP 13 PM 3:29

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA

BY: *[Signature]*

*IFP Submitted*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CAMDEN JAMBOREE DEVELOPMENT LP

Plaintiff,

vs.

Jasmine Johnson ; DOES 1 TO  
10 INCLUSIVE,

Defendant.

Case number :

*8:24-cv-1982*  
*JVS (ADSx)*

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-TITLED COURT AND THE HONORABLE UNITED  
STATES DISTRICT JUDGE:

PLEASE TAKE NOTICE that Defendant JASMINE JOHNSON ("Defendant") hereby  
remove to this Court the above-captioned action described further below:

1. THE PROCEDURAL REQUIREMENTS FOR REMOVAL ARE SATISFIED.

**PROOF OF SERVICE**

I am over the age of 18 and not a party to this action.

I am a resident of or employed in the county where the mailing occurred; my business/residence address is:

On September 10, 2024, I served the foregoing document(s) described as: **NOTICE OF STAY OF PROCEEDINGS** to the following parties

☒ (By U.S. Mail) I deposited such envelope in the mail at  
Los Angeles, California with postage thereon fully  
prepaid. I am aware that on motion of the party served,  
service is presumed valid in postal cancellation date or  
postage meter date is more than one day after date of deposit  
for mailing in affidavit.

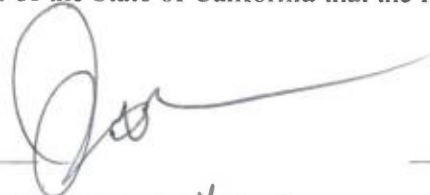
☐ (By Personal Service) I caused such envelope to be delivered  
by hand via messenger service to the address above;

☐ (By Facsimile) I served a true and correct copy by facsimile  
during regular business hours to the number(s) listed above.  
Said transmission was reported complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct.

**Dated :**

9/13/24

  
Jojo Williams

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<b>ATTORNEY OR PARTY WITHOUT ATTORNEY</b> NAME: Danielle T. Kussler #180144/Susan E. Greek #126739 FIRM NAME: Kimball, Tirey & St. John LLP STREET ADDRESS: 2040 Main Street, Suite 500 CITY: Irvine TELEPHONE NO.: (949) 476-5585 EMAIL ADDRESS: OCefiling@kts-law.com ATTORNEY FOR (name): Plaintiff		<b>STATE BAR NUMBER:</b>  <b>FOR COURT USE ONLY</b>	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 700 CIVIC CENTER DRIVE WEST MAILING ADDRESS: CITY AND ZIP CODE: SANTA ANA, CA 92701 BRANCH NAME: CENTRAL JUSTICE CENTER		Dept C66	
PLAINTIFF: Camden Jamboree Development, L.P. dba Camden Main & Jamboree DEFENDANT: Jasmine Johnson <input checked="" type="checkbox"/> DOES 1 TO 10 inclusive			
<b>COMPLAINT—UNLAWFUL DETAINER*</b> <input checked="" type="checkbox"/> COMPLAINT <input type="checkbox"/> AMENDED COMPLAINT (Amendment Number):		CASE NUMBER: 30-2024-01416110-CL-UD-CJC	
Jurisdiction (check all that apply): <input checked="" type="checkbox"/> ACTION IS A LIMITED CIVIL CASE (amount demanded does not exceed \$35,000) Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input checked="" type="checkbox"/> exceeds \$10,000 <input type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds \$35,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint or cross-complaint (check all that apply): <input type="checkbox"/> from unlawful detainer to general unlimited civil (possession not in issue). <input type="checkbox"/> from limited to unlimited. <input type="checkbox"/> from unlawful detainer to general limited civil (possession not in issue). <input type="checkbox"/> from unlimited to limited.			

1. PLAINTIFF (name each):  
Camden Jamboree Development, L.P. dba Camden Main & Jamboree  
  
alleges causes of action against DEFENDANT (name each):  
Jasmine Johnson
2. a. Plaintiff is (1) ☐ an individual over the age of 18 years. (4) ☐ a partnership.  
(2) ☐ a public agency. (5) ☐ a corporation.  
(3) ☒ other (specify): Limited Partnership
- b. ☒ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of (specify):  
Camden Main & Jamboree
3. a. The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):  
2801 Main St. #448  
Irvine, Orange County, CA 92614  
County of Orange
- b. The premises in 3a are (check one)  
(1) ☒ within the city limits of (name of city): Irvine  
(2) ☐ within the unincorporated area of (name of county):
- c. The premises in 3a were constructed in (approximate year): 2008
4. Plaintiff's interest in the premises is ☒ as owner ☐ other (specify):
5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

\*NOTE: Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).

**COMPLAINT — UNLAWFUL DETAINER**



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PLAINTIFF: Camden Jamboree Development, L.P. dba Camden Main & Jamboree  
 DEFENDANT: Jasmine Johnson

CASE NUMBER:

6. a. On or about (date): 06/10/2024

defendant (name each):

Jasmine Johnson

(1) agreed to rent the premises as a ☐ month-to-month tenancy ☒ other tenancy (specify): 1 Year

(2) agreed to pay rent of \$ 4,142.15 payable ☒ monthly ☐ other (specify frequency):

(3) agreed to pay rent on the ☒ first of the month ☐ other day (specify):

b. This ☒ written ☐ oral agreement was made with

(1) ☒ plaintiff. (3) ☐ plaintiff's predecessor in interest.

(2) ☐ plaintiff's agent. (4) ☐ Other (specify):

c. ☒ The defendants not named in item 6a are

(1) ☐ subtenants.

(2) ☐ assignees.

(3) ☒ Other (specify): Unknown

d. ☐ The agreement was later changed as follows (specify):

e. ☐ A copy of the written agreement, including any addenda or attachments that form the basis of this complaint, is attached and labeled Exhibit 1. (Required for residential property, unless item 6f is checked. See Code Civ. Proc., § 1166.)

f. ☒ (For residential property) A copy of the written agreement is not attached because (specify reason):

(1) ☐ the written agreement is not in the possession of the landlord or the landlord's employees or agents.

(2) ☒ this action is solely for nonpayment of rent (Code Civ. Proc., § 1161(2)).

7. The tenancy described in 6 (complete (a) or (b))

a. ☐ is not subject to the Tenant Protection Act of 2019 (Civil Code, § 1946.2). The specific subpart supporting why tenancy is exempt is (specify):

b. ☒ is subject to the Tenant Protection Act of 2019.

8. (Complete only if item 7b is checked. Check all applicable boxes.)

a. ☒ The tenancy was terminated for at-fault just cause (Civil Code, § 1946.2(b)(1)).

b. ☐ The tenancy was terminated for no-fault just cause (Civil Code, § 1946.2(b)(2)) and the plaintiff (check one)

(1) ☐ waived the payment of rent for the final month of the tenancy, before the rent came due, under section 1946.2(d)(2), in the amount of \$

(2) ☐ provided a direct payment of one month's rent under section 1946.2(d)(3), equaling \$  
 to (name each defendant and amount given to each):

c. ☐ Because defendant failed to vacate, plaintiff is seeking to recover the total amount in 8b as damages in this action.

9. a. ☒ Defendant (name each): Jasmine Johnson

was served the following notice on the same date and in the same manner:

(1) ☒ 3-day notice to pay rent or quit

(2) ☐ 30-day notice to quit

(3) ☐ 60-day notice to quit

(4) ☐ 3-day notice to quit

(5) ☐ 3-day notice to perform covenants or quit

(not applicable if item 7b checked)

(6) ☐ 3-day notice to quit under Civil Code, § 1946.2(c)

Prior required notice to perform covenants served (date):

(7) ☐ Other (specify):

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PLAINTIFF: Camden Jamboree Development, L.P. dba Camden Main & Jamboree  
 DEFENDANT: Jasmine Johnson

CASE NUMBER:

9. b. (1) On (date): 07/16/2024 the period stated in the notice checked in 9a expired at the end of the day.  
 (2) Defendants failed to comply with the requirements of the notice by that date.  
 c. All facts stated in the notice are true.  
 d. ☒ The notice included an election of forfeiture.  
 e. ☒ A copy of the notice is attached and labeled Exhibit 2. (Required for residential property. See Code Civ. Proc., § 1166. When Civil Code, § 1946.2(c), applies and two notices are required, provide copies of both.)  
 f. ☐ One or more defendants were served (1) with the prior required notice under Civil Code, § 1946.2(c), (2) with a different notice, (3) on a different date, or (4) in a different manner, as stated in Attachment 10c. (Check item 10c and attach a statement providing the information required by items 9a–e and 10 for each defendant and notice.)
10. a. ☒ The notice in item 9a was served on the defendant named in item 9a as follows:  
 (1) ☐ By personally handing a copy to defendant on (date):  
 (2) ☐ By leaving a copy with (name or description):  
 a person of suitable age and discretion, on (date): at defendant's  
☐ residence. ☐ business AND mailing a copy to defendant at defendant's place of residence  
 on (date): because defendant cannot be found at defendant's residence or usual place of business.  
 (3) ☒ By posting a copy on the premises on (date): 07/11/2024  
☒ AND giving a copy to a person found residing at the premises AND mailing a copy to defendant at the premises  
 on (date): 07/11/2024  
 (a) ☐ because defendant's residence and usual place of business cannot be ascertained OR  
 (b) ☒ because no person of suitable age or discretion can be found there.  
 (4) ☐ (Not for 3-day notice; see Civil Code, § 1946, before using) By sending a copy by certified or registered mail  
 addressed to defendant on (date):  
 (5) ☐ (Not for residential tenancies; see Civil Code, § 1953, before using) In the manner specified in a written  
 commercial lease between the parties
- b. ☐ (Name):  
 was served on behalf of all defendants who signed a joint written rental agreement.  
 c. ☐ Information about service of notice on the defendants alleged in item 9f is stated in Attachment 10c.  
 d. ☐ Proof of service of the notice in item 9a is attached and labeled Exhibit 3.
11. ☐ Plaintiff demands possession from each defendant because of expiration of a fixed-term lease.
12. ☒ At the time the 3-day notice to pay rent or quit was served, the amount of rent due was \$ 4,142.15
13. ☒ The fair rental value of the premises is \$ 138.07 per day.
14. ☐ Defendant's continued possession is malicious, and plaintiff is entitled to statutory damages under Code of Civil Procedure section 1174(b). (State specific facts supporting a claim up to \$600 in Attachment 14.)
15. ☒ A written agreement between the parties provides for attorney fees.
16. ☐ Defendant's tenancy is subject to the local rent control or eviction control ordinance of (city or county, title of ordinance, and date of passage):

Plaintiff has met all applicable requirements of the ordinances.

17. ☐ Other allegations are stated in Attachment 17.
18. Plaintiff accepts the jurisdictional limit, if any, of the court.



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PLAINTIFF: Camden Jamboree Development, L.P. dba Camden Main & Jamboree  
 DEFENDANT: Jasmine Johnson

CASE NUMBER:

## 19. PLAINTIFF REQUESTS

- a. possession of the premises.  
 b. costs incurred in this proceeding:  
 c. ☒ past-due rent of \$ 4,142.15  
 d. ☒ reasonable attorney fees.  
 e. ☒ forfeiture of the agreement.  
 f. ☐ damages in the amount of waived rent or relocation assistance as stated in item 8: \$  
 g. ☒ damages at the rate stated in item 13 from date: 08/01/2024 for each day that defendants remain in possession through entry of judgment.  
 h. ☐ statutory damages up to \$600 for the conduct alleged in item 14.  
 i. ☐ other (specify):

20. ☒ Number of pages attached (specify): 2

## UNLAWFUL DETAINER ASSISTANT (Bus. &amp; Prof. Code, §§ 6400–6415)

21. ☒ (Complete in all cases.) An unlawful detainer assistant ☒ did not ☐ did for compensation give advice or assistance with this form. (If declarant has received any help or advice for pay from an unlawful detainer assistant, complete a–f.)

- a. Assistant's name:  
 b. Street address, city, and zip code:  
 c. Telephone no.:  
 d. County of registration:  
 e. Registration no.:  
 f. Expires on (date):

Date: 07/25/2024

Danielle T. Kussler, SBN 180144

(TYPE OR PRINT NAME)

Is/ Danielle T. Kussler

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

## VERIFICATION

(Use a different verification form if the verification is by an attorney or for a corporation or partnership.)

I am the plaintiff in this proceeding and have read this complaint. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

See attached verification

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF)